

# Bayer CropScience



November 30, 2004

Mr. Dan Kenny  
US Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division  
Document Processing Desk (REGFEE)  
Crystal Mall Building 2, Room 266A  
1801 South Bell Street  
Arlington, VA 22202-4501

Dear Mr. Kenny:

Re: ENCORE<sup>®</sup> Insecticide, EPA Reg. No. 264-783 ✓  
PROVADO<sup>®</sup> 1.6 Flowable Insecticide, EPA Reg. No. 264-763 ✓  
PROVADO<sup>®</sup> Solupak 75% WP Insecticide, EPA Reg. No. 264-761 ✓  
PROVADO<sup>®</sup> 70 WG Insecticide, EPA Reg. No. 264-823 ✓  
Label Amendment – Increase in Cotton Use Rate and Revised Plant-back  
Interval for Onions/Bulb Vegetables

Enclosed is an amended labeling for the referenced product registrations that includes the following changes:

1. Revised the application rate for cotton from "1.0 to 1.5" to "1.0 to 2.0" fluid ounces per acre. A justification for the slight increase in the treatment rate is enclosed. This change is supported by the residue studies that were initially conducted to register the cotton use in 1995. Therefore, no changes in the established tolerances for cottonseed, cotton meal and cotton gin by-products are required.
2. Added a 10-month rotational crop interval for onions and bulb vegetables. According to a ChemSAC decision dated February 25, 2004, "it was decided that a tolerance for inadvertent (crop rotational) residues in/on onions is not necessary contingent upon the potato seed piece treatment rate (on a per acre basis) being similar to the primary crop rate used in advance of rotation to turnip. This decision was based on turnip root residues being 0.01 ppm (LOD) 11 months after rotation in limited field rotational crop studies."

To complete this submission, we are enclosing the following documents:

1. An application for registration form 8570-1.
2. Certification with Respect to Citation of Data (Form 8579-34).
3. Data matrix (Form 8570-35).
4. A CD containing an electronic file of the amended labeling.
5. A Certification with Respect to Label Integrity

Bayer CropScience  
2 T.W. Alexander Drive  
RTP, NC 27709  
Phone: 919-549-2000

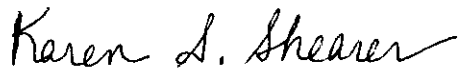
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6. Five (5) paper copies of the proposed labeling for the referenced products.  
One copy is shaded and the other five copies are not shaded.

In addition, I have enclosed supplemental documents to assist the EPA reviewer with this request. The documents include a copy of the ChemSAC decision of February 25, 2004 and the EPA review dated May 11, 1995 that is referenced in the enclosed study report.

If you have any questions, please contact me either by telephone at 919-549-2365 or e-mail at [karen.shearer@bayercropscience.com](mailto:karen.shearer@bayercropscience.com).

Sincerely,



Karen S. Shearer  
Team Lead – Insecticide Registrations  
Regulatory Affairs

Bayer CropScience



TRANSMITTAL DOCUMENT

1. Name and Address of Submitter:

Bayer CropScience  
PO Box 12014, 2 T.W. Alexander Drive  
Research Triangle Park NC 27709

*Karen S. Shearer*

Karen S. Shearer  
Team Lead – Insecticide Registrations  
Regulatory Affairs  
Telephone: 919-549-2365

2. Regulatory Action in Support of:

ENCORE<sup>®</sup> Insecticide, EPA Reg. No. 264-783  
PROVADO<sup>®</sup> 1.6 Flowable Insecticide, EPA Reg. No. 264-763  
PROVADO<sup>®</sup> Solupak 75% WP Insecticide, EPA Reg. No. 264-761  
PROVADO<sup>®</sup> 70 WG Insecticide, EPA Reg. No. 264-823

3. Transmittal Date: November 30, 2004

4. List of Submitted Documents for Imidacloprid:

MRID No.	Study No.	Study Title
46417001	1	Heintzelman, R.W. (2004) Justification for a Rate Increase for ENCORE <sup>®</sup> Insecticide on Cotton, Report No. RWH 2004/10-13, Bayer CropScience, p. 10.